

Adam Alba, 13128
2167 N. Main St.
Centerville, UT 84014
(801) 792-8785
adam.alba@gmail.com

Attorney for Plaintiffs

FILED
U.S. DISTRICT COURT

2011 JUL 13 P 12:11

DISTRICT OF UTAH

BY: _____
DEPUTY CLERK

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

KODY BROWN, MERI
BROWN, JANELLE BROWN, CHRISTINE
BROWN, ROBYN SULLIVAN,

Plaintiffs,

v.

GARY R. HERBERT, in his official
capacity as Governor of Utah; MARK
SHURTLEFF, in his official capacity as
Attorney General of Utah; JEFFREY R.
BUHMAN, in his official capacity as
County Attorney for Utah County,

Defendants.

MOTION FOR PRO HAC VICE ADMISSION

AND

CONSENT OF LOCAL COUNSEL

JUDGE: 2:11CV652 CW


CIVIL NO. _____

Pursuant to D.U. Civ R 83-1.1(d), I, Adam Alba, move the admission of Jonathan Turley as pro hac vice counsel for plaintiffs and consent to serve as local counsel. The application for pro hac vice admission is attached as Exhibit A to this motion. A proposed order is attached as Exhibit B, and an Electronic Case Filing Registration Form is attached as Exhibit C. The admission fee has been paid to the court with the submission of this motion.

Professor Turley is lead counsel for the Brown family. He meets the standard expected by the court of a pro hac vice counsel. He has previously served pro hac vice in various states and has handled some of the most notable constitutional and criminal cases of the last decade. He has been repeatedly ranked as one of the country's top litigators. His bio is available at <http://jonathanturley.org/about/>. Professor Turley is also currently serving as an expert on international and U.S. law in the Canadian Supreme Court's consideration of whether the criminalization of polygamy is a violation of the Charter on Human Rights and international law. His participation as lead counsel will guarantee that this case is prosecuted with the high standards and expertise in the field.

In light of the foregoing, the undersigned respectfully moves for the admission of Jonathan Turley as pro hac vice counsel for the plaintiffs.

Dated July 13, 2011


Adam Alba